

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X
In re: :
 : CHAPTER 13
YOLANDA A. JOHNSON :
 :
 Debtor : CASE NO.: 15-15578-mdc
 :
 CONSUMER PORTFOLIO SERVICES :
 :
 Plaintiff :
 : **11 U.S.C. §362**
 v. :
 :
 YOLANDA A. JOHNSON :
 :
 Defendant :
 :
 WILLIAM C. MILLER, TRUSTEE :
 :
 Respondent :
-----X

**OBJECTIONS/RESPONSE TO CREDITOR'S MOTION FOR RELIEF
FROM STAY PURSUANT TO 11 U.S.C SECTION 362(d)(1)**

Debtor in this matter, by and through her counsel Roach Leite & Manyin, LLC responds to the instant Motion and states the following grounds therefore:

1. Admitted upon information and belief.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.

7. Admitted upon information and belief.
8. Admitted.
9. Admitted upon information and belief.
10. Admitted upon information and belief.
11. Admitted upon information and belief.
12. Denied. Movant has not demonstrated in any manner that said averment is true and correct.
13. Denied. Movant has not demonstrated in any manner that said averment is true and correct.
14. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

WHEREFORE, Debtors pray that Movant's Motion be denied, and for such other further relief the Court deems just and proper.

Date: December 13, 2016
Philadelphia, Pennsylvania

Roach, Leite & Manyin, LLC

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor
6950 Castor Avenue
Philadelphia, Pa 19149
(267) 343-5818
Rleite@rlmfir.com

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CERTIFICATE OF SERVICE

I, Robert Leite-Young, certify that on this 13th day of December 2016, the following Debtor's Praeipue to Withdraw has been served upon the following parties, at the addresses designated by said parties for that purpose via the Court's ECF electronic filing system to the following parties of record:

Peter J. Ashcroft, Esquire
Bernstein-Burkley, P.C.
707 Grant Street, Ste 2200, Gulf Tower
Pittsburgh, PA 15219

Office of The United States
833 Chestnut Street
Suite 500
Philadelphia, PA 19107

Trustee William C. Miller
1234 Market Street, Suite 1813
Philadelphia, PA 19107

Date: December 13, 2016
Philadelphia, Pennsylvania

Roach, Leite & Manyin, LLC

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor
6950 Castor Avenue
Philadelphia, Pa 19149
(267) 343-5818